

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X
KATHRYN ROBB,

Plaintiff,

-against -

GEORGE ROBB, Jr.,

Defendant.
-----X

Index No.: _____/19

Plaintiff designates
NEW YORK COUNTY
as place of trial.The basis of venue is
The Defendant's residence
addressSUMMONSPlaintiff's residence address
is 26 Bowker Street
Lexington, MA 02421

To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: Jordan MersonJordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:

GEORGE ROBB, Jr.
35 Vesey St., Apt. 6
New York, NY 10013-1744

-and-

3730 Sunrise Lane
Key West, Florida 33040

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

-----X

KATHRYN ROBB,

Plaintiff,

-against -

**VERIFIED
COMPLAINT**

GEORGE ROBB, Jr.,

Defendant.

-----X

COMPLAINT AND JURY TRIAL DEMANDED

Plaintiff KATHRYN ROBB (hereinafter "Plaintiff" or "Ms. Robb") by and through his counsel Merson Law, PLLC, and as for his Complaint in this action against Defendant GEORGE ROBB, Jr. (hereinafter "defendant" or "Mr. Robb") hereby alleges the following:

NATURE OF THE CLAIM

1. An older brother has no greater familial responsibility than to protect his younger sister. Here, Defendant Mr. Robb did the opposite and harmed his younger sister in the worst way possible by sexually abusing her while she slept and tried to sleep, repeatedly, for years. To this day, nearly fifty years later, Ms. Robb is haunted by what her brother did to her all those times.

2. From about 1968 and continuing until approximately 1974, when plaintiff was eight years old and continuing until she was fourteen, defendant sexually abused her, almost nightly by assaulting her breasts and vagina with his hands, fingers, mouth and other objects. Due to the repeated sexual abuse, plaintiff has suffered severe emotional pain and suffering and

will continue to suffer severe emotional pain and suffering, and she has been and will continue to be unable to live a normal life.

3. At the time of the sexual abuse and assaults, Plaintiff was between eight and fourteen years old. At the time of the sexual abuse and assaults, Defendant was between thirteen and nineteen years old.

4. Defendant would come into plaintiff's bedroom in their home in Manhasset, New York almost every single night and sexually abuse her. He further abused her at the family's summer home in Quogue, New York.

5. Plaintiff would wake up almost every night for six years to defendant pulling down her underwear, penetrating her with his hands or fingers, performing oral sex on her and otherwise sexually abusing her. Defendant's sexual assaults were so forceful and violent, plaintiff would often have blood in her underwear from the attacks.

6. Plaintiff was and is still unable to sleep and suffers from panic attacks.

7. Defendant sexually abused plaintiff at least hundreds of times, if not more than one thousand times.

8. In addition to the physical injuries from being assaulted and battered, Plaintiff suffered and will continue to suffer permanent psychological trauma for the rest of her life.

9. The predatory, sexual attack on Plaintiff by Defendant left her with severe and permanent physical and psychological injuries.

AS FOR A FIRST CAUSE OF ACTION

(BATTERY)

10. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 9. inclusive, with the same force and effect as if hereafter set forth at length.

11. Beginning in 1968 and continuing through 1974, Defendant sexually abused plaintiff, his sister, almost nightly by forcefully penetrating her vagina with his hands and/or fingers, mouth and other objects.

12. Defendant's predatory, sexual, and unlawful acts against plaintiff, amounted to a series of harmful and offensive contacts to Plaintiff's person all of which were done intentionally by defendant to plaintiff without plaintiff's consent.

13. As a direct and proximate result of the aforementioned batteries, Plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

14. As a direct and proximate result of the aforementioned batteries, Plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

15. Plaintiff is unable pursue her usual activities and employment, all due to her physical, psychological, and emotional injuries and damage she sustained due to the aforementioned batteries.

16. By reason of the foregoing, Plaintiff was caused to sustain severe and serious personal injuries, a severe shock to her nervous system, and certain internal injuries, and was

caused to suffer severe physical pain and mental anguish as a result thereof, and upon information and belief these injuries are of a permanent and lasting nature; that said plaintiff was incapacitated from attending her regular activities, and was caused to expend sums of money for medical care on her behalf.

17. By reason of the foregoing, the plaintiff, is entitled to compensatory damages from defendant in such sums as a jury would find fair, just, and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendant in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar conduct.

18. The amount of damages sought exceeds the jurisdiction of all lower courts that would otherwise have jurisdiction.

19. This action falls with exceptions to Article 16 of the C.P.L.R.

AS FOR A SECOND CAUSE OF ACTION
(ASSAULT)

20. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 19. inclusive, with the same force and effect as if hereafter set forth at length.

21. Defendant's predatory, sexual and unlawful acts against Plaintiff, created a reasonable apprehension in plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by defendant to plaintiff without plaintiff's consent.

22. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained in the past, and will continue to sustain in the future, physical injury, pain and

suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.

23. As a direct and proximate result of the aforementioned assaults, Plaintiff has incurred medical expenses and other economic damages, and continues to be in physical pain and suffering, and will now be obligated to expend sums of money for medical care and attention in an effort to cure herself of her injuries and to alleviate her pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.

24. Plaintiff continues to be unable, to pursue her usual activities and employment all due to the physical, psychological and emotional injuries and damage she sustained due to the aforementioned assaults.

25. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendant in such sums as a jury would find fair, just and adequate, and the plaintiff, is further entitled to punitive and exemplary damages from defendant in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar misconduct.

26. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

27. This action falls within the exceptions to Article 16 of the C.P.L.R.

AS FOR A THIRD CAUSE OF ACTION
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

28. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 27. inclusive, with the same force and effect as if hereafter set forth at length.

29. Defendant engaged in outrageous conduct towards plaintiff, with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress.

30. As a proximate result of the aforementioned assaults, batteries and false imprisonment to Plaintiff, she has suffered and continues to suffer extreme mental distress, humiliation, anguish and emotional and physical injuries, as well as economic losses, all her damage in amounts to be proven at trial.

31. Defendant committed the acts alleged herein maliciously, fraudulently and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

32. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

33. This action falls within the exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiff demands judgement against defendant in such sum as a jury would find fair, adequate and just containing the following relief:

A. A declaratory judgement that the actions, conduct and practices of Defendant complained of herein violated the laws of the State of New York;

B. An injunction and order permanently restraining Defendant from engaging in such unlawful conduct;

C. An award of damages in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic harm; harm to her personal and professional reputations and loss of career fulfillment; for all non-monetary and/or compensatory harm, including but not limited to, compensation for physical anguish and

mental anguish; all other monetary and/or non-monetary losses suffered by Plaintiff; and that by reason of the foregoing, Plaintiff sustained damages in a sum, pursuant to C.P.L.R. §3017, which exceeds the jurisdictional limits of all lower courts;

D. An award of punitive damages;

E. An award of costs that Plaintiff has incurred in this action, as well as Plaintiff's reasonable attorney's fees to the fullest extent permitted by law; and.

F. Such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Sarah R. Cantos
Attorney for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: _____/19

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KATHRYN ROBB,*Plaintiff,**-against -***ATTORNEY
VERIFICATION**


GEORGE ROBB, Jr.,

Defendant.
-----X

JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York State, and a member of the firm MERSON LAW, PLLC., attorneys for the plaintiff in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in the file.

That the reason this verification is made by affirmant and not by the plaintiff is that the plaintiff is not within the County where the attorney has his office. 

Dated: New York, New York
August 14, 2019



JORDAN K. MERSON

Index No.

Year 2019

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KATHRYN ROBB,

Plaintiff (s),

- against -

GEROGE ROBB, JR.,

Defendant(s),

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

Office and Post Office Address, Telephone

150 East 58th Street 34th Fl.

New York, New York 10155

(212) 603-9100

To: All Parties
